

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: FEDLOAN STUDENT LOAN SERVICING LITIGATION	No. 18-md-02833 ORAL ARGUMENT REQUESTED
THIS DOCUMENT RELATES TO: <i>ALL ACTIONS</i>	HON. C. DARNELL JONES, II

**PLAINTIFFS' NOTICE OF MOTION TO APPOINT LOWEY DANNENBERG, P.C. AS
INTERIM CLASS COUNSEL, ESTABLISH AN EXECUTIVE COMMITTEE, AND FOR
LEAVE TO FILE A CONSOLIDATED AMENDED CLASS ACTION COMPLAINT**

TO THE COURT AND ALL PARTIES AND THEIR ATTORREYS OF RECORD:

PLEASE TAKE NOTICE that on June 27, 2018, in the courtroom of the Honorable C. Darnell Jones, II, United States District Court for the Eastern District of Pennsylvania, Plaintiffs in the related actions: (1) *Salvatore v. PHEAA*, 1:17-cv-00385 (M.D. Pa.); (2) *Morris et al. v. PHEAA*, 2:18-cv-00031 (E.D. Pa.); (3) *Clancy v. PHEAA*, 2:18-cv-00753 (E.D. Pa.); (4) *Keegan et al. v. PHEAA*, 2:18-cv-01143 (E.D. Pa.); (5) *Anderson v. PHEAA*, 2:18-cv-01378 (E.D. Pa.); will and hereby do move the Court, under Federal Rule of Civil Procedure 23, for an order:

- (1) Appointing the law firm of Lowey Dannenberg, P.C. ("Lowey") as interim class counsel for the above-captioned action under Federal Rule of Civil Procedure 23(g) ("Lead Counsel");
- (2) Establishing an executive committee of Lowey, Peiffer Wolf Carr & Kane APLC ("PWCK"), and Edelson & Associates LLC ("Edelson"); and
- (3) Granting leave to file a consolidated amended class action complaint.

This motion is based on this Notice of Motion, the incorporated Memorandum of Law, the accompanying Proposed Order, and attached firm resumes.

Dated: June 27, 2018

Respectfully submitted,

LOWEY DANNENBERG, P.C.

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